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PEGGY M. HATCH
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20090001
Agency Interest No. 328

Kevin Driscoll
Mill Manager
International Paper
P.O. Box 999
Mansfield, Louisiana 71052

RE: Part 70 Operating Permit, Mansfield Mill
International Paper Company, Mansfield, Desoto Parish, Louisiana

Dear Mr. Craft:

This is to inform you that the permit renewal/modification for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the ____ of _____, 2015, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Department may initiate review of a permit during its term. However, before it takes any action to modify, suspend or revoke a permit, the Department shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or operational conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Done this _____ day of _____, 2010.

Permit No.: 0760-00006-V9

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

CSN:bsc
c: EPA Region VI

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
INTERNATIONAL PAPER COMPANY, MANSFIELD MILL
PROPOSED PART 70 AIR OPERATING PERMIT RENEWAL/MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on the proposed Part 70 air operating permit renewal/modification for International Paper Co, 1202 Hwy 509, Mansfield, Louisiana 71052 for the Mansfield Mill. The facility is located at 1202 Hwy 509 in Mansfield, DeSoto Parish.

The International Paper Co requested a Part 70 air operating renewal/modification for the Mansfield Mill. The modification includes the following:

- Remove the following sources: Caterpillar Back-up Diesel Air Compressor No. 1 (36-96), Auxiliary Diesel Generator No. 1 (38-96), and Auxiliary Diesel Generator No. 2 (39-96);
- Establish an IC Engine Emissions Cap (ENGCAP) to include the following sources: Detroit Diesel Fire-water Pump No. 2 (46-96), Detroit Diesel Fire-water Pump No. 3 (47-96), Clarifier Diesel Engine "Big Bubba" (48-96), Waste Clarifier Diesel Engine (49-96), Administration Building Diesel Generator (50-96), Effluent Lift Pit Diesel Engine (51-96), Mud Storage Diesel Engine (52-96), Clarke Fire-water Pump Engine (65-05), and the Lime Kiln Auxiliary Engine (66-05);
- Establish an emissions cap for Miscellaneous IC Engines (ENGCAP2) for engines not otherwise defined;
- Increase short-term (hourly) maximum rates for the Nos. 1 and 3 Paper Machines from their current levels to 120 scale weight tons (SWT)/hr;
- Increase the production from the Tall Oil Plant from 70,343 tpy to 80,000 tpy of tall oil;
- Add cotton gin trash and cottonseed as fuels for the Power Boilers (1-78 and 2-78);
- Add a black liquor enhancer as chemical make-up and an alternative fuel in the Nos. 1 and 2 Recovery Boilers (4-78 and 5-78);
- Replace the No. 1 Spill Tank (28-93p) with a similar tank with the capability of storing spent caustic as well as black liquor;
- Evaluate sewerage of turpentine decanter underflow (instead of recycling the stream to the diffusion washers);
- Update the General Condition XVII Activities and the Insignificant Activities list; and,
- Update emissions calculations for various sources.

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	1392.05	1424.31	+ 32.26
SO ₂	8859.84	8855.57*	- 4.27
NO _x	6228.37	6166.26	- 62.11
CO	9270.47	9255.26	- 15.21
VOC	5175.66	5191.47	+ 15.81
TSP	-	1683.18**	+ 1683.18
TRS	225.66	229.60	+ 3.94
Nickel***	3.49	3.53	+ 0.04
Barium***	45.27	45.35	+ 0.08
Copper***	2.63	2.71	+ 0.08

* This total does not reflect the combined emissions cap placed on both of the power boilers (EQT 5 and EQT 35), which is 4,195.73 tpy. When this cap is in effect, the total emissions limitation is 6271.04 tons per year.

**Previously not reported.

***and compounds). These pollutants have increased by an amount greater than their minimum emission rates (MERs) listed in LAC.33.III.Chapter 51. Table 51.1.

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, April 19, 2010.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The permit application, proposed Part 70 air operating renewal and modification and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

Additional copies may be reviewed at the DeSoto Parish Library, Mansfield Main Library, Headquarters, 109 Crosby Street, Mansfield, LA 71052.

Inquiries or requests for additional information regarding this permit action should be directed to Shane Clary, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3069.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmailistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permit and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 328, Permit Number 0760-00006-V9, and Activity Number PER20090001.

Scheduled Publication Date: March 18, 2010

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

International Paper Co - Mansfield Mill

Agency Interest No.: 328

International Paper Co

Mansfield, DeSoto Parish, Louisiana

I. Background

International Paper Company (IP) owns and operates a kraft pulp and paper mill near the city of Mansfield, Louisiana, in DeSoto Parish. The Mansfield Mill currently operates under Permit Nos. 0760-00006-V8, dated May 3, 2007, and PSD-LA-93(M-7), dated July 22, 2004.

This is the Part 70 operating permit renewal/modification for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted by IP on January 22, 2009 requesting a Part 70 operating permit renewal/modification for the Mansfield Mill.

III. Description

Production activities at the Mansfield Mill (the Mill) include pulp production (SIC code 2611) and linerboard production (SIC code 2631). Primary operations at the Mill include multiple fuel-fired boilers (power), wood pulping, chemical recovery, tall oil, causticizing and lime recovery, non-condensable gas collection area, recycle area (de-inking), and papermaking.

Power Operations

The Mill uses five steam and/or power generating units to produce all of the steam needed for its processes. Two power boilers, capable of firing multiple fuels, provide steam for the Mill's production processes and to turbines for generating electricity. Two recovery boilers (also called recovery furnaces), firing primarily black liquor, also provide steam for the Mill's production processes and to turbines for generating electricity. Electricity is generated from three steam turbines and one gas turbine. The gas turbine is equipped with a heat recovery steam generator (HRSG), which generates steam from the turbine exhaust gases and combustion gases from a duct burner.

Fuels combusted in the Mill's steam and power generating units include fossil fuels, biomass fuels, and waste/recycled (alternative) fuels. Fuels are generated onsite, delivered by truck or rail and stored onsite, or delivered by pipeline. Liquid fuel storage operations include fuel oils (Nos. 2, 4, and 6 fuel oils, distillate grades, used on-specification oil, and used petroleum mineral spirits) and gasoline storage and dispensing. Two No. 6 fuel oil tanks and one No. 2 fuel oil tank comprise the majority of fossil fuel storage capacity at the facility. Coal is delivered by rail car or truck. The coal handling equipment includes hoppers, vibrators, a crusher, conveyors, and silos. The conveyors are partially or totally enclosed, and these

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enclosed conveyors and silos are controlled with a baghouse. The crusher is not used and has been locked out permanently since the 1990s.

No. 6 fuel oil is stored for use in combustion sources including power boilers, recovery furnaces, and the Lime Kiln; No. 2 fuel oil can be burned in power boilers, recovery furnaces, the Lime Kiln, and several stationary internal combustion (IC) engines. Other grades of fuel oil (i.e., No. 4, distillate grades, used on-specification oil, or used petroleum mineral spirits) are combined with the No. 2 or No. 6 fuel oils in their respective tanks. Gasoline is stored at the facility for use in mobile equipment. Nine stationary diesel-fired IC engines provide backup power generation capacity during power outages or other emergencies.

The Nos. 1 and 2 Power Boilers are permitted to burn wood waste, coal, fuel oil, natural gas, and alternative fuels. Wood waste includes bark/wood debris, paper and solid wood residuals (from saw mills, plywood mills, oriented strand board mills, and clarifier fiber sludge), creosote-treated wood waste, recycle plant sludge, unrecyclable old corrugated container material, and bagasse. Fuel oils include Nos. 2, 4, and 6 fuel oils, distillate grades, used on-specification oil, used petroleum mineral spirits, and onsite fuel oil solids. Alternative fuels include tire-derived fuel (TDF), solid paraffin, high caustic, and pine tar fuels. The boilers are base-loaded on own-make bark and then on purchased bark, coal, fuel oil, natural gas, and alternative fuels, based on cost, availability (i.e., operations and/or market), and to a lesser degree other factors, such as weather conditions (dry bark is preferable to wet bark).

All steam generated from the power boilers, the gas turbine's HRSG duct burner, and recovery boilers is sent to a common header. From this header, steam can be sent to various processes (i.e., digesters and paper machines) or sent through one of the steam turbines to generate electricity. Any additional electricity needed is purchased from the Central Louisiana Electric Company (CLECO).

Pulping Operations

The Mill has three pulping lines: Primary, Secondary, and Semi-chemical. Hardwood and/or softwood chips are cooked with white liquor in the Primary and Secondary Continuous Digesters. Hardwood chips are cooked with white and green liquor in the Semi-chemical Continuous Digester. Anthraquinone can also be added to the digesters to improve reaction kinetics and increase pulp yield (the addition of this chemical does not result in an increase above maximum production or emission rates for any source).

The pulp slurry from the digesters is refined, washed in diffusion washers, stored in high density storage tanks, and then sent to the paper machine area. Vents from the diffusion

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washers and associated filtrate tanks are collected in the High Volume, Low Concentration (HVLC) system. Spent cooking liquor (also called weak liquor or weak black liquor) from the filtrate tanks is used to wash the pulp in the digesters and/or sent to the chemical recovery area. Gases from the digester system are routed through the Low Volume, High Concentration (LVHC) Non-Condensable Gas (NCG) System, and then incinerated in the Lime Kiln or back-up NCG Incinerator.

Turpentine is recovered as a by-product from condensed gases from the pine pulping process. Overheads from the turpentine recovery process are routed through the LVHC NCG System.

Chemical Recovery Operations

Kraft and semi-chemical weak liquor (also called weak black liquor or spent cooking liquor) from the pulping process is filtered and stored in separate weak black liquor tanks. Spent caustic can be temporarily stored and added to the liquor stream as needed. The liquor is normally combined in the Swing Black Liquor Tank and concentrated in one of two parallel lines which include a six-effect evaporator system, intermediate storage, and a concentrator system. On the No. 1 side, the black liquor is further concentrated in either the No. 1 Concentrator (2 bodies) and the High Solids Concentrator (1 body), or the Nos. 1A/1B Super Concentrator (2 bodies) before entering the Heavy Black Liquor Tank. On the No. 2 side, the black liquor is further concentrated in the No. 2 Concentrator System (2 bodies).

Tall oil soap is produced as a by-product of the evaporation process mentioned above. Liquor is extracted from an intermediate stage of each evaporator system and sent to a dedicated soap skimmer where tall oil soap is skimmed from the top of the tank. The soap is then sent to collection tanks and combined in the soap storage tank prior to being sent to the Tall Oil Plant. Brine from the Tall Oil Plant is introduced prior to the concentrators in the chemical recovery area. The brine is pumped to the third-effect on the No. 1 and/or No. 2 Evaporator Systems. Some gases from the evaporator systems are partially condensed, while the remaining gases are routed to the LVHC NCG system. Condensates are stored in the foul condensate tank and sent to the steam stripper.

Targeted foul and combined evaporator condensates are collected in a closed collection system and hard-piped to the foul condensate tank or to the stripped condensate tank. The foul condensate tank is vented to the LVHC system and the stripped condensate tank is vented to the HVLC system. Condensates are hard-piped to any of the five existing diffusion washers. Any combined condensates not recycled to the diffusion washers are recycled to the causticizing area and used as dilution or wash water. In addition, the turpentine decanter underflow is routed to the sewer when making certain grades of linerboard.

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Liquor from the concentrators is combined in the concentrated black liquor storage tank and sent to liquor recovery. The Mill operates two liquor recovery systems that process concentrated liquor. The Mill recovers cooking chemicals by firing black liquor solids into either of two non-direct contact recovery boilers (No. 1 and No. 2 Recovery Boilers). The organics from the liquor are combusted to generate heat for process steam, while the inorganic chemicals collect in the bottom of the boilers in the form of molten smelt. Each boiler is fed heavy liquor and has its own associated smelt tank, electrostatic precipitator (ESP), and exhaust stack. The particulate from the ESP is sluiced with black liquor or water.

The molten smelt from each recovery boiler is directed to one of two dedicated tanks, where it is dissolved into weak wash or water to form green liquor, a prerequisite to regenerating white liquor in the causticizing operation. Each smelt tank is equipped with a Ducon scrubber system designed to capture particulates and gaseous pollutants and return them to the smelt tank.

Tall Oil Operations

The Tall Oil Plant produces crude tall oil (CTO) from black liquor soap. Black liquor soap is a by-product of the kraft pulping process that contains fatty resins and oils that have wide commercial uses. CTO is produced in a process called tall oil acidulation, where black liquor soap is combined with sulfuric acid and steam in a continuous reactor, allowing the production of CTO from the mixture. The remaining liquid is a combination of lignin and a brine solution, composed primarily of sodium sulfate and water. The brine solution is introduced back into the recovery cycle for the reclamation of the chemical value (sodium and sulfur).

The Tall Oil Plant allows the Mill to generate a maximum of 70,343 tons per year of CTO. Emission sources from the plant include a Heel Liquor Sample Tank, soap tanks, a continuous tall oil reactor, sulfuric acid tanks, CTO tanks, and brine tanks. The Heel Liquor Sample Tank and soap tanks minimize emissions of volatile organic compounds (VOCs) and total reduced sulfur (TRS) from downstream units as settled liquor is sent to weak black liquor storage. (Note: the Heel Liquor Sample Tank is only used during the first few minutes of soap unloading. The purpose of the tank is to collect any settled black liquor during transportation.) Most of the organics from this liquor are volatilized in the evaporators and destroyed in the kiln. The reactor is equipped with a wet scrubber for control of TRS emissions. In addition, the CTO tanks, brine receiver, and cleaner accepts tank are vented through the tall oil scrubber. The brine and settled black liquor from the soap tanks are introduced into the chemical recovery area. The settled black liquor from the Heel Liquor Sample Tank and soap tanks are recycled to any of three weak liquor tanks, while the brine is

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reintroduced into the chemical recovery area at the third-effect of the Nos. 1 or 2 Evaporator Systems.

Causticizing and Lime Recovery Operations

In the causticizing/lime recovery area, dissolved smelt (green liquor) from the smelt dissolving tanks is clarified, stored, and then mixed with lime (calcium oxide) in the slaker. The sodium salts in the green liquor react with the lime to form white liquor and lime mud (calcium carbonate) in the causticizers. This white liquor/lime mud slurry is then clarified to separate the white liquor from the lime mud. The white liquor is sent to the digesters, and the lime mud is conditioned in the lime mud mix tank and washers, stored, thickened in the precoat filter, and then burned in the lime kiln to form lime. Fuels burned in the lime kiln include natural gas, fuel oils (Nos. 2, 4, and 6 fuel oils, distillate grades, used on-specification oil, and used petroleum mineral spirits) and LVHC NCG gases. The slaker and lime kiln are equipped with wet scrubbers. Weak wash from the lime mud washers is used to dissolve the inorganics in the smelt tank and for particulate matter/total reduced sulfur control in the smelt tank scrubbers.

Burnt lime from the lime kiln is conveyed to a lime silo prior to being added to the slaker. The Mill can also purchase fresh lime, which is blown from trucks and added to the same silo as the burnt lime. Fresh/reburnt lime is dropped into the slaker from the bottom of the silo. The lime silo and bucket elevator are exhausted through the slaker scrubber.

Gas Collection System

The Mill operates two separate gas collection systems: HVLC and LVHC. In the HVLC System, vents collected from the stripped condensate tank, diffusion washers, and associated filtrate tanks are burned in the natural gas-fired HVLC Incinerator. Combusted gases pass through a quench tower and scrubber, which is equipped with a mist eliminator, and then out the stack, while the liquid is routed to the sewer system.

In the LVHC NCG System, NCGs are collected in three separate lines. The concentrated pulp system collects NCGs from the digester and turpentine recovery systems. The dilute pulp system collects NCGs from the digester chip bin vents. The Powerhouse concentrated system collects NCGs from the evaporator, concentrator, and steam stripper systems.

The three inlet streams each pass through a wet scrubber and are normally burned in the lime kiln. The NCG Incinerator is a backup system used to destroy the NCGs in case the lime kiln is unavailable. The incinerator is kept running continuously on standby, burning natural gas

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so that it remains at a suitable operating temperature should the NCGs need to be diverted from the lime kiln.

Papermaking and Recycle Operations

The Mill produces unbleached and white top linerboard and corrugating medium from the Nos. 1, 2, and 3 Paper Machines. Furnish for each of the machines can be either virgin pulp from the three pulp lines or recycled pulp from the recycle plant.

Pulp from the pulp mill high density tanks or from the recycle tanks is sent to the low density tanks, where it is refined, screened, and combined with wet end additives prior to being diluted with recycled water at the primary and secondary head boxes of the machine. The low consistency slurry is then applied to the wire, where it forms a sheet. Water drains by gravity and by vacuum into a series of pits, while the wet sheet travels to the press and dryer sections to remove the remaining water. The resulting paper is cut and rolled onto finishing reels.

All paper machine water, called white water, is screened in the save-all to recover any lost fiber, and then either stored and recycled within the Mill or routed to the wastewater treatment plant. A fiber recovery system is also installed for the white water that is sent to the sewer. Recovered fiber is recycled via the broke system. Scrap paper from the finishing operations is repulped and combined with the recovered fiber from the save-all in the broke storage chests. This pulp is then recycled to the primary machine chest.

The recycle plant consists of two lines. One line has a continuous repulper; the other has two batch repulpers in parallel. Two additional repulpers (EQT 153 and EQT 154) are permitted, but have not yet been constructed. The recycle plant is capable of processing old corrugated containers, mixed papers, and de-inked fibers. The pulp slurry is screened, washed, and bleached (non-chlorine bleaching) prior to being sent to the low density tanks in the paper machine areas.

Additional Mill Operations

The Mill maintains miscellaneous operations that support pulp and paper production. Operations in this area include wood supply, raw water treatment, wastewater collection and treatment, waste treatment and disposal, road traffic, maintenance, process cooling, quality control, and other support operations that are insignificant sources of regulated air pollutants. The Woodyard processes all wood used in the digesters and all wood waste used as fuel in the power boilers.

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Pine and hardwood logs are delivered by truck or rail car and processed separately. The logs are cut in the slasher, debarked, chipped, and conveyed to separate chip piles. Purchased chips are unloaded from trucks, screened, and conveyed to the hardwood or softwood chip piles. Hardwood chips are screened and conveyed to the Secondary or Semi-chemical Digesters, and pine chips are screened and conveyed to the Primary or Secondary Digesters. The chip screens are enclosed, and the chip conveyors are partially or totally enclosed to minimize emissions during transport.

Wood waste is generated onsite and is purchased or brought in from off-site sources. Wood waste generated onsite includes several sources as a result of processing logs and or chips that are used in the digester system and purchased wood waste is brought in from off-site sources. Bark and sawdust from the slashers, bark from the debarking drums, fines from purchased or own-make chip screening, and purchased bark unloaded from trucks are conveyed to the bark hogs (where large pieces are reduced), and then conveyed to the bark pile. Reclaimed bark is then fired in the Nos. 1 and 2 Power Boilers.

Raw water is pumped approximately 28 miles from the Toledo Bend Reservoir and used throughout the Mill as process and cooling water.

The wastewater from the Mill consists of storm water from process areas, sanitary wastewater, and process wastewater from the papermaking, recycle, power, pulping, and causticizing and lime recovery operations. The process wastewater from the No. 3 Paper Machine area is sent to the primary clarifiers, where solids can be settled. The settled No. 3 Paper Machine process wastewater, process wastewater from the rest of the Mill, stormwater, and landfill leachate are routed to the equalization basin where solids settle and treatment occurs. The effluent from the equalization basin is then further treated by land application through spraying or wetlands flow. Most of the wastewater is sprayed onto the land (~600 acres), with treated water being collected and piped five miles for discharge to the Red River. The remaining wastewater is pumped to a wetland area for treatment, with treated water being collected and piped to the Red River. A surge basin stores wastewater during times of excessive flow. The sanitary wastewater is pretreated, chlorinated, then applied to land in combination with the clarified process wastewater.

The Mill disposes of process waste in an onsite landfill. Process waste includes ash from the power boilers, woodyard waste, sludge from the wastewater pretreatment process, recycle plant rejects, caustic plant waste (i.e., dregs, lime, and slaker grit), refuse, and miscellaneous waste (e.g., ditch clean-up).

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Road traffic occurs from the delivery of raw materials (i.e., purchased chips, logs, paper machine additives, and chemicals) and the transport of products (i.e., paper, turpentine, and crude tall oil). Maintenance operations include welding and metal fabrication, painting, as well as routine equipment and building upkeep.

With this renewal/modification, International Paper proposes to:

- Remove the following sources: Caterpillar Back-up Diesel Air Compressor No. 1 (36-96), Auxiliary Diesel Generator No. 1 (38-96), and Auxiliary Diesel Generator No. 2 (39-96);
- Establish an IC Engine Emissions Cap (ENGCAP) to include the following sources: Detroit Diesel Fire-water Pump No. 2 (46-96), Detroit Diesel Fire-water Pump No. 3 (47-96), Clarifier Diesel Engine "Big Bubba" (48-96), Waste Clarifier Diesel Engine (49-96), Administration Building Diesel Generator (50-96), Effluent Lift Pit Diesel Engine (51-96), Mud Storage Diesel Engine (52-96), Clarke Fire-water Pump Engine (65-05), and the Lime Kiln Auxiliary Engine (66-05);
- Establish an emissions cap for Miscellaneous IC Engines (ENGCAP2) for engines not otherwise defined;
- Increase short-term (hourly) maximum rates for the Nos. 1 and 3 Paper Machines from their current levels to 120 scale weight tons (SWT)/hr;
- Update emission factors for the Tall Oil Reactor Scrubber (56-98f) to reflect testing performed in September and October of 2008;
- Increase the production from the Tall Oil Plant from 70,343 tpy to 80,000 tpy of tall oil;
- Change the source description of the Mud Storage Diesel Generator (52-96) to Mud Storage Diesel Engine (52-96) to accurately reflect the type of unit;
- Update the evaporator systems to reflect the current configuration (as a result of the 1997 and 2004 Mansfield Production Increase Plan Projects): ID No. NCG-M/EQT 188 (previously Intermediate Solids Concentrator and High Solids Concentrator) is now two sources: High Solids Concentrator (EQT 185 and NCG-M) and 1A/1B Super Concentrator (EQT 189 and NCG-N).

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- Change the source description of a unit in the No. 2 Paper Machine area from stock chest to machine chest to accurately reflect the type of unit: No. 2 PM – Machine Chest (ID No. 21-04k);
- Add cotton gin trash and cottonseed as fuels for the Power Boilers (1-78 and 2-78);
- Add a black liquor enhancer as chemical make-up and an alternative fuel in the Nos. 1 and 2 Recovery Boilers (4-78 and 5-78);
- Replace the No. 1 Spill Tank (28-93p) with a similar tank with the capability of storing spent caustic as well as black liquor;
- Reconcile emission calculations for the Landfill (25-93), Swing Weak Black Liquor Storage Tank (28-93e), Boiler Feedwater/Steam Condensate Treatment (53-96), and Paint Yard (54-96) to reflect actual operations;
- Update emission calculations to incorporate PM emissions for the Paper Machines (ID Nos. 20-93, 21-93, and 22-93);
- Evaluate sewerage of turpentine decanter underflow (instead of recycling the stream to the diffusion washers);
- Update the Insignificant Activities list to include a new No. 2 Fuel Oil Storage Tank proposed in the Case-by-case Insignificant Activity Form submitted on November 19, 2008, as well as a new diesel storage tank proposed in the Case-by-case Insignificant Activity Form submitted on May 11, 2007.
- Update the General Condition XVII Activities to include Diesel Internal Combustion Engines used during Mill maintenance activities; and,
- Include miscellaneous permit updates such as corrections, clarifications, additions, or removal of regulations or specific requirements.

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Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
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NO _x	6228.37	6166.26	- 62.11
CO	9270.47	9255.26	- 15.21
VOC	5175.66	5191.47	+ 15.81
TSP	-	1683.18**	+ 1683.18
TRS	225.66	229.60	+ 3.94

* This total does not reflect the combined emissions cap placed on both of the power boilers (EQT 5 and EQT 35), which is 4,195.73 tpy. When this cap is in effect, the total emissions limitation is 6271.04 tons per year.

**Previously not reported.

VOC LAC 33:III Chapter 51 Toxic Air Pollutants (Tons/yr):

Pollutant	Before	After	Change
1,1,2-Trichloroethane	0.03	0.03	-
1,2,4-Trichlorobenzene	6.2	6.14	- 0.06
1,2-Dichloropropane	0.06	0.06	-
1,3-Butadiene	< 0.01	< 0.01	-
2,2,4-Trimethylpentane	< 0.01	< 0.01	-
Acetaldehyde	58.69	58.83	+ 0.14
Acetophenone	0.10	0.10	-
Acrolein	4.69	4.70	+ 0.01
Benzene	4.35	4.39	+ 0.04
Biphenyl	< 0.01	< 0.01	-
Carbon disulfide	1.03	1.03	-
Chlorinated dibenzo furans	< 0.0001	< 0.0001	-
Chlorinated dibenzo p-dioxins**	< 0.0001	< 0.0001	-
Chlorobenzene	< 0.01	< 0.01	-
Chloroform	0.38	0.38	-
Chloromethane	0.24	0.24	-
Cresol	< 0.01	< 0.01	-
Cumene	4.16	4.18	+ 0.02

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VOC LAC 33:III Chapter 51 Toxic Air Pollutants (Tons/yr); cont.

Pollutant	Before	After	Change
Ethylbenzene	0.39	0.06	- 0.33
Ethylene oxide	< 0.01	< 0.01	-
Formaldehyde	33.37	33.44	+ 0.07
Glycol ethers (Table 51.1)	1.80	1.78	- 0.02
n-Hexane	6.01	5.68	- 0.33
Hydroquinone	0.05	-	-
Methanol	2976.69	2977.88	+ 1.19
Methyl ethyl ketone	18.80	18.61	- 0.19
Methyl isobutyl ketone	1.35	1.33	- 0.02
Naphthalenes	55.14	55.14	-
Phenol	1.08	1.08	-
PAH	0.83	0.83	-
Propionaldehyde	0.30	0.30	-
Styrene	3.64	3.63	- 0.01
Toluene	6.16	5.88	- 0.28
Trichloroethylene	0.14	0.14	-
Triethylamine	< 0.01	< 0.01	-
Xylene (mixed isomers)	4.82	3.54	- 1.28

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Non-VOC LAC 33:III Chapter 51 Toxic Air Pollutants (Tons/yr):

Pollutant	Before	After	Change
Ammonia	184.87	184.85	- 0.02
Manganese*	36.87	36.81	- 0.06
Mercury*	0.16	0.16	-
Nickel*	3.49	3.53	+ 0.04
Selenium*	0.31	0.31	-
Sulfuric acid	134.21	134.21	-
Zinc*	30.21	30.17	- 0.04
POM	55.65	55.63	- 0.02
Antimony*	0.22	0.22	-
Arsenic*	0.10	0.10	-
Barium*	45.27	45.35	+ 0.08
Beryllium*	0.62	0.63	+ 0.01
Cadmium*	0.04	0.04	-
Chlorine	0.56	0.56	-
Chromium VI*	0.05	0.04	- 0.01
Cobalt*	1.28	1.28	-
Copper*	2.63	2.71	+ 0.08
Hydrochloric acid	318.40	318.36	- 0.04
Hydrofluoric acid	34.06	33.96	- 0.10
Hydrogen sulfide	124.84	132.20	+ 7.36
Lead compounds	0.42	0.42	-
Dichloromethane	180.14	180.10	- 0.04
Tetrachloroethylene	0.36	0.37	+ 0.01
1,1,1-Trichloroethane	1.88	1.89	+ 0.01

*and compounds

** includes 2,3,7,8-TCDB-p-dioxin

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IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70 and the Louisiana Air Quality Regulations. New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and Prevention of Significant Deterioration (PSD) apply.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. Based on updated emissions calculations, nickel, barium, and copper have increased by amounts greater than their respective minimum emission rates (MERs). Maximum Achievable Control Technology (MACT) is required for these Class I (nickel) and Class 2 (barium and copper) toxic air pollutant (TAPs).

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Emissions associated with the proposed facility were reviewed by the Air Quality Assessment Division to ensure compliance with the NAAQS and AAS. LDEQ did not require the applicant to model emissions.

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VIII. General Condition XVII Activities

Work Activity	Emission Rates - TPY					
	VOC	NOx	PM	SO2	CO	TRS
Turpentine Decanter Overflow Primary Standpipe	1.3					0.18
Turpentine Decanter Overflow Secondary Standpipe	1.3					0.18
Utilities Air Compressor						
Pulp Mill Air Compressor	0.39	4.84	0.34	0.32	1.04	
Wood yard Air Compressor						
Mill wide Generator	0.17	2.08	0.15	0.14	0.45	
Mill wide Vacuum Truck	0.23	2.79	0.20	0.18	0.60	
Utilities Welding Machine						
Pulp Mill Welding Machine						
Wood yard Welding Machine	0.35	4.30	0.30	0.28	0.93	
Finished Products Welding Machine						
Shipping Welding Machine						
Utilities Hydroblaster						
Pulp Mill Hydroblaster	0.14	4.84	0.14	0.03	1.11	
Finished Products Hydroblaster						

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IX. Insignificant Activities

ID No.:	Description	Operating Rate (Max) or Tank Capacity	Citation ¹
58-00a	Auxiliary Air Compressors Diesel Tank	2040 gals	A.3
58-00b	Auxiliary Generator Diesel Storage	1500 gals	A.3
58-00c	Fire Pumps Diesel Storage	280 gals	A.3
58-00d	Lake Pump Diesel Storage	1900 gals	A.3
58-00e	Lift Pit Pump Diesel Storage	550 gals	A.3
58-00f	Lime Kiln Fuel Oil Day Tank	7686 gals	A.3
58-00g	Effluent Clarifiers Diesel Storage	575 gals	A.3
58-00h	Solid Waste Contractor Shop Diesel Tank	550 gals	A.3
58-00i	Admin Building Diesel Generator Tank	550 gals	A.3
58-00j	Firewater Generator No. 3 PM Diesel Storage	550 gals	A.3
58-00k	Lift Pit No. 3 PM Diesel Storage	550 gals	A.3
58-05l	Lime Kiln Engine Diesel Storage Tank	560 gals	A.3
58-07m	No. 3 PM Diesel Storage Tank	550 gals	A.3
58-08n	No. 2 Fuel Oil Storage Tank	8000 gals	A.3
-	Caustic Storage Tanks	-	A.10
-	Water washing operations	-	A.7
-	Fuel-burning heating equipment	<1 MM Btu/hr	A.5
-	Laboratory equipment/vents	-	A.6
-	Package Boiler	-	B.32

¹LAC 33:III.501.B.5

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ID No.	Description	LAC 33:III. Chapter										LAC 33:III. Chapter				
		5▲	509	9	11	13	15	2103	2111	2113	2115	2301	29*	51*	56	59
ARE 5	Entire Facility	1	1	1	1	1	1						1	1	1	2
EQT 5	25-93 Landfill														1	1
EQT 5	01-78 No. 1 Power Boiler	1	1	1	1	1	1						1	1	2	
EQT 6	03-78 Lime Kiln												1	1	1	
EQT 7	13-93 Gas Turbine/HRSG Stack	1	1	1	1	1	1						2			
EQT 8	Crude Tall Oil - Tall Oil Reactor Scrubber												1	1		
EQT 9	56-98f Soda Ash Unloading												1	1		
EQT 10	57-99 HVLC Incinerator							1	1				1			
EQT 12	33-93 Oxidized Starch Silo	1	1										1			
EQT 13	24-93 Wastewater Treatment							1								
EQT 14	08-78 Lime Slaker/Lime Handling												1			
EQT 15	06-78 No. 1 Smelt Dissolving Tank	1							1				1	1		
EQT 16	45-96 No. 2 Fuel Oil Bulk Tank	1								3			1			
EQT 17	Process Liquor Tanks - Soap Skimmer Tank (No. 1)										1		1			
EQT 19	53-96 Boiler Feedwater/Steam Condensate Treatment Oper.	1											1			
EQT 21	34-93 Talc Silo	1														
EQT 22	61-01 Pearl Starch Silo	1														
EQT 23	56-98a Crude Tall Oil - Soap Unloading Facilities	1	1										1			
EQT 24	56-98i Crude Tall Oil - Tall Oil Loading Facilities	1	1										1			
EQT 25	09-78 NCG Incinerator	1	1	1	1	1	1						1			

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		5▲	509	9	11	13	15	2103	2111	2113	2115	2301	29*	51*	56	59
EQT 28 46-96 2	Detroit Diesel Fire-Water Pump No. 2															
EQT 29 47-96 3	Detroit Diesel Fire-Water Pump No. 3															
EQT 30 48-96	Clarifier Diesel Engine "Big Bubba"															
EQT 31 49-96	Waste Clarifier Diesel Engine															
EQT 32 50-96	Administration Building Diesel Generator															
EQT 33 51-96	Effluent Lift Pit Diesel Engine															
EQT 34 52-96	Mud Storage Diesel Generator															
EQT 35 02-78	No. 2 Power Boiler															
EQT 36 04-78	No. 1 Recovery Boiler															
EQT 37 05-78	No. 2 Recovery Boiler															
EQT 38 07-78	No. 2 Smelt Dissolving Tank															
EQT 39 20-93e	No. 1 Paper Machine – No. 1 White Water Storage Tank															
EQT 40 20-93f	No. 1 Paper Machine – No. 2 White Water Storage Tank															
EQT 41 20-93h	No. 1 Paper Machine – No. 1 Broke Storage Tank															
EQT 42 20-93i	No. 1 Paper Machine – No. 2 Broke Storage Tank															

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ID No.	Description	LAC 33:III Chapter										51*	56	59
		5▲	509	9	11	13	15	2103	2111	2113	2115			
EQT 43	20-93j Linerboard Whitewater Tank		1							1				
EQT 44	21-93e No. 2 Paper Machine – White Water Storage Tank		1							1				
EQT 45	21-93g No. 2 Paper Machine – Broke Storage Tank		1							1				
EQT 46	21-93h Corrugated Medium Whitewater Tank		1							1				
EQT 47	22-01p No. 3 Paper Machine – T/S Reclaims/Reject Tank		1							1				
EQT 48	22-93b No. 3 Paper Machine – High Density Thickener Tank		1							1				
EQT 49	22-93f No. 3 Paper Machine – T/S Excess White Water Tank		1							1				
EQT 50	22-93h No. 3 Paper Machine – Filtered White Water Tank		1							1				
EQT 51	22-93i No. 3 Paper Machine – B/S White Water Storage Tank		1							1				
EQT 52	22-93j No. 3 Paper Machine – T/S White Water Storage Tank		1							1				
EQT 53	22-93l No. 3 Paper Machine – Broke Storage Tank		1							1				
EQT 54	28-93a PLT – Primary Weak Black Liquor Storage Tank East		1							1				
EQT 55	28-93b PLT – Primary Weak Black Liquor Storage Tank West		1							1				

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ID No.	Description	LAC 33:III Chapter												
		5▲	509	9	11	13	15	2103	2111	2113	2301	29*	51*	56
EQT 56	PLT - Secondary Weak Black Liquor Storage Tank	1								1			1	
EQT 57	PLT - Semicarbonylic Weak Black Liquor Storage Tank	1								1			1	
EQT 58	PLT - Swing Weak Black Liquor Storage Tank	1								1			1	
EQT 59	PLT - No. 1 Intermediate Black Liquor Storage Tank	1								1			1	
EQT 60	PLT - No. 2 Intermediate Black Liquor Storage Tank	1								1			1	
EQT 61	PLT - Heavy Black Liquor Storage Tank	1								1			1	
EQT 62	PLT - Soap Skimmer Tank (No. 2)	1								1			1	
EQT 63	PLT - Soap Collection Tank (No. 1)	1								1			1	
EQT 64	PLT - Soap Collection Tank (No. 2)	1								1			1	
EQT 65	PLT - Soap Storage Tank	1								1			1	
EQT 66	Boilout Tank	1								1			1	
EQT 67	No. 1 Spill Tank	1								1			1	
EQT 68	No. 2 Spill Tank	1								1			1	
EQT 69	#1 RB Black Liquor Dump Tank	1								1			1	
EQT 70	#2 RB Black Liquor Dump Tank	1								1			1	

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ID No.	Description	LAC 33:III Chapter													
		5▲	509	9	11	13	15	2103	2111	2113	2115	2301	29*	51*	56
EQT 71	Causticizing Area – No. 1 Green Liquor Clarifier	1								1			1		
EQT 72	Causticizing Area – No. 2 Green Liquor Clarifier		1							1			1		
EQT 73	Causticizing Area – No. 1 Green Liquor Storage Tank		1							1			1		
EQT 74	Causticizing Area – No. 2 Green Liquor Storage Tank		1							1			1		
EQT 75	Causticizing Area – No. 1 Weak Wash Tank			1						1			1		
EQT 76	Causticizing Area – No. 2 Weak Wash Tank			1						1			1		
EQT 77	Causticizing Area – No. 1 White Liquor Clarifier				1						1		1		
EQT 78	Causticizing Area – No. 2 White Liquor Clarifier				1						1		1		
EQT 79	Causticizing Area – No. 1 White Liquor Storage Tank				1						1		1		
EQT 80	Causticizing Area – No. 2 White Liquor Storage Tank				1						1		1		
EQT 81	Causticizing Area – No. 3 White Liquor Storage Tank				1						1		1		
EQT 82	Causticizing Area – Lime Mud Mix Tank				1						1		1		
EQT 83	Causticizing Area – Lime Mud Storage Tank				1						1		1		

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		5▲	509	9	11	13	15	2103	2111	2113	2115	2301	29*	51*	56
EQT 84	29-93v Waste Clarifier		1							1				1	
EQT 85	29-93w Sodium Hydrosulfide Tank #1		1											1	
EQT 86	29-93x Sodium Hydrosulfide Tank #2		1											1	
EQT 87	31-93i Density Chest A		1										1		1
EQT 88	31-93j Density Chest B		1										1		1
EQT 89	31-93k Density Chest C		1										1		1
EQT 90	31-93l Density Chest		1										1		1
EQT 91	31-93m High Density Chest		1										1		1
EQT 92	31-93n Pine Digester Dump Tank		1										1		1
EQT 93	31-93o Hardwood Digester Dump Tank		1										1		1
EQT 94	31-93p Semichemical Digester Dump Tank		1										1		1
EQT 96	40-96 Unleaded Gasoline Bulk Tank		1										1		1
EQT 98	43-96 No. 6 Fuel Oil Storage Tank		1										3		3
EQT 99	44-96 Fuel Oil Day Tank (No. 6)		1										3		3
EQT 100	56-98b Crude Tall Oil - Soap Receiving Tank		1										1		1
EQT 101	56-98c Crude Tall Oil - Soap Decanting Tank		1										1		1

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ID No.	Description	LAC 33:III Chapter												
		5▲	509	9	11	13	15	2103	2111	2113	2301	29*	51*	56
EQT 102 56-98d	Crude Tall Oil - Soap Blend Tank									1			1	
EQT 103 56-98e	Crude Tall Oil - Sulfuric Acid Storage Tank										1			
EQT 104 56-98g	Crude Tall Oil - Neutralized Brine Storage Tank								1		1			
EQT 105 56-98h	Crude Tall Oil - Brine Feed Tank							1			1			
EQT 106 56-98i	Crude Tall Oil - Heel Liquor Sample Tank											1		
EQT 107 59-00a	Sulfuric Acid Supply Tank										1			
EQT 108 59-00b	Demin Water Acid Mix Tank										1			
EQT 109 59-00c	#3 PM Acid Supply Tank										1			
EQT 110 59-00d	#3 PM Bulk Sulfuric Acid Tank										1			
EQT 111 14-93	Repulper #1										1			
EQT 112 15-93	Repulper #2										1			
EQT 113 16-93	Repulper #3										1			
EQT 114 20-01n	No. 1 PM - Semichemical Fiber Sidehill Washing								1		1			
EQT 115 20-01o	No. 1 PM - HW Refiner Low Density Chest									1	1			
EQT 116 20-01p	No. 1 PM - Short Fiber Blend Chest									1	1			
EQT 117 20-93a	No. 1 PM - Grouped Source								1		1			

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		5▲	509	9	11	13	15	2103	2111	2113	2115	2301	29*	51*	56
EQT 118	20-93b No. 1 PM - Save-all Vent No. 1												1	1	
EQT 119	20-93c No. 1 PM - Save-all Mixing Chest												1	1	
EQT 120	20-93d Filtrate Chest												1	1	
EQT 121	20-93g No. 1 PM - Broke Repulper												1	1	
EQT 122	20-93k #1 PM Secondary Pine Low Density Chest												1	1	
EQT 123	20-93l #1 PM Primary Pine Low Density Chest												1	1	
EQT 124	20-93m #1 PM Hardwood Low Density Chest												1	1	
EQT 125	21-04k No. 2 PM - No. 2 PM Stock Chest												1	1	
EQT 126	21-93a No. 2 PM - Grouped Source												1	1	
EQT 127	21-93b No. 2 PM - Save-all Vent No. 1												1	1	
EQT 128	21-93c No. 2 PM - Save-all Mixed Stock Chest												1	1	
EQT 129	21-93d No. 2 PM - Save-all White Water Filtrate Chest												1	1	
EQT 130	21-93f No. 2 PM - Broke Repulper												1	1	
EQT 131	21-93i #2 PM Pine Low Density Chest												1	1	
EQT 132	21-93j #2 PM Semichemical Low Density Chest												1	1	

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		5▲	509	9	11	13	15	2103	2111	2113	2115	2301	29*	51*	56
EQT 133 22-01n	No. 3 PM - HW Fiber Low Density Chest/Standpipes	1									1			1	
EQT 134 22-01o	No. 3 PM - Pine Fiber Low Density Chest/Standpipes	1								1			1		
EQT 135 22-93a	No. 3 PM - Grouped Source	1								1			1		
EQT 136 22-93c	No. 3 PM - Save-all Vent	1								1			1		
EQT 137 22-93d	No. 3 PM - Save-all Stock Chest	1								1			1		
EQT 138 22-93g	No. 3 PM - AES Filters	1								1			1		
EQT 139 22-93k	No. 3 PM - Broke Repulper	1								1			1		
EQT 140 22-93m	#3 PM Virgin Fiber Low Density Chest	1								1			1		
EQT 142 29-93e	Causticizing Area - Dregs Filter	1								1			1		
EQT 143 29-93f	Causticizing Area - No. 1 Causticizer	1								1			1		
EQT 144 29-93g	Causticizing Area - No. 2 Causticizer	1								1			1		
EQT 145 29-93h	Causticizing Area - No. 3 Causticizer	1								1			1		
EQT 146 29-93i	Causticizing Area - No. 4 Causticizer	1								1			1		
EQT 147 29-93r	Causticizing Area - No. 1 Lime Mud Washer	1								1			1		
EQT 148 29-93s	Causticizing Area - No. 2 Lime Mud Washer	1								1			1		

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ID No.	Description	LAC 33:III:Chapter													
		5▲	509	9	11	13	15	2103	2111	2113	2115	2301	29*	51*	56
EQT 149 29-93u	Causticizing Area – Lime Mud Precoat Filter								1					1	
EQT 150 30-93a	Black Liquor Filters – Secondary Black Liquor Filter								1					1	
EQT 151 30-93b	Black Liquor Filters – Primary Black Liquor Filter								1					1	
EQT 152 60-00	Fiber Reclaims System												1		
EQT 153 63-04	Repulper #4			1									1		
EQT 154 64-04	Repulper #5		1										1		
EQT 155 NCG-A	Primary Digester System											1	3		1
EQT 156 NCG-B	Secondary Digester System										1	3		1	
EQT 157 NCG-C	Semichemical Digester System										1	3		1	
EQT 158 NCG-D	No. 1 Evaporator									1	3		1		
EQT 159 NCG-E	No. 2 Evaporator									1	3		1		
EQT 160 NCG-H	No. 1 Concentrator/Intermediate Solids Concentrator									1	3		1		
EQT 161 NCG-I	No. 2 Concentrator System									1	3		1		
EQT 162 NCG-J	Condensate Stripper System									1	3		1		
EQT 163 NCG-K	Turpentine Decanter									1			1		
EQT 164 12A-78	Diffusion Washer Vent A									1			1		
EQT 165 12B-78	Diffusion Washer Vent B									1			1		

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

International Paper Co - Mansfield Mill
Agency Interest No.: 328
International Paper Co
Mansfield DeSoto Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III:Chapter												
		5▲	509	9	11	13	15	2103	2111	2113	2301	29*	51*	56
EQT 166	12C-78 Diffusion Washer Vent C											1	1	
EQT 167	12D-78 Diffusion Washer Vent D											1	1	
EQT 168	12E-78 Diffusion Washer Vent E											1	1	
EQT 169	NCG-L Tupentine Storage											3		
EQT 170	28-93i Stripped Condensate Tank											1	1	
EQT 171	31-93a Primary Filtrate Tank Vent – Washer A (Vent A)											1	1	
EQT 172	31-93b Primary Filtrate Tank Vent – Washer A (Vent B)											1	1	
EQT 173	31-93c Primary Filtrate Tank Vent – Washer B (Vent A)											1	1	
EQT 174	31-93d Primary Filtrate Tank Vent – Washer B (Vent B)											1	1	
EQT 175	31-93e Secondary Filtrate Tank Vent – (Vent A)											1	1	
EQT 176	31-93f Secondary Filtrate Tank Vent – (Vent B)											1	1	
EQT 177	31-93g Semi-chemical Filtrate Tank Vent – (Vent A)											1	1	
EQT 178	31-93h Semi-chemical Filtrate Tank Vent – (Vent B)											1	1	
EQT 179	TO-A Crude Tall Oil-Brine Receiver Tank											1	1	
EQT 180	TO-B Crude Tall Oil-Cleaner Accepts Tank											1	1	

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International Paper Co - Mansfield Mill
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International Paper Co
Mansfield DeSoto Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33-III.Chapter													
		5▲	509	9	11	13	15	2103	2111	2113	2115	2301	29*	51*	56
EQT 181	TO-C Crude Tall Oil-Wet CTO Tank											1		1	
EQT 182	TO-D Crude Tall Oil-Dry CTO Tank											1		1	
EQT 183	22-93e No. 3 Paper Machine – B/S Excess White Water Tank											1		1	
EQT 184	32-93 Cationic Starch Silo	1	1												
EQT 185	NCG-M High Solids Concentrator											1	3	1	
EQT 186	65-05 Clarke Fire-Water Pump			1										2	
EQT 187	66-05 Lime Kiln Auxiliary Engine				1									2	
EQT 188	- Miscellaneous Diesel-fired Rental Engines					1								2	
EQT 189	NCG-N 1A/1B Super Concentrator											1	3	1	
FUG 1	17-93 Coal Storage/Handling	1	1												
FUG 2	18-93 Ash Handling Operations			1											
FUG 3	19-93 Bark/Woodwaste/Sludge Handling				1										
FUG 4	23-93 Woodyard Grouped Source					1									
FUG 5	26-93 Haul Roads						1								
FUG 6	54-96 Paint Yard							1					1		
GRP 3	- Pulping Condensates												1		

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- * The regulations indicated above are State Only regulations.
- ▲ All LAC 33:II Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
 Blank - The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

International Paper Co - Mansfield Mill
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International Paper Co
Mansfield DeSoto Parish, Louisiana

X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR				
		A	D	Db	Kb	BB	GG	A	M	A	S	MM	DDDDD	64	68
ARE 5	Entire Facility	1						1	1	1	1	1		2	
ARE 5	Landfill														
EQT 5	No. 1 Power Boiler				1									1	
EQT 6	Lime Kiln														
EQT 7	Gas Turbine/HRSG Stack							1							
EQT 7	Crude Tall Oil - Tall Oil Reactor Scrubber							1			1			3	
EQT 8															
EQT 9	Soda Ash Unloading														
EQT 10	HVLC Incinerator							1			1				
EQT 12	Oxidized Starch Silo													1	
EQT 13	Wastewater Treatment														
EQT 14	Lime Slaker/Lime Handling													1	
EQT 15	No. 1 Smelt Dissolving Tank							1			1			3	
EQT 16	No. 2 Fuel Oil Bulk Tank								3						
EQT 17	Process Liquor Tanks - Soap Skimmer Tank (No. 1)														
EQT 19	Boiler Feedwater/Steam Condensate Treatment Oper.														
EQT 21	Talc Silo														
EQT 22	Pearl Starch Silo													1	
EQT 23	Crude Tall Oil - Soap Unloading														
EQT 24	Crude Tall Oil - Tall Oil Loading														
EQT 25	NCG Incinerator							1			1				
EQT 28	Detroit Diesel Fire-Water Pump No. 2														

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR 64			
		A	D	D _b	K _b	BB	GG	A	M	A	S	MM	DDDDD	64
EQT 29	47-96 Detroit Diesel Fire-Water Pump No. 3													
EQT 30	48-96 Clarifier Diesel Engine "Big Bubba"													
EQT 31	49-96 Waste Clarifier Diesel Engine													
EQT 32	50-96 Administration Building Diesel Generator													
EQT 33	51-96 Effluent Lift Pit Diesel Engine													
EQT 34	52-96 Mud Storage Diesel Generator													
EQT 35	02-78 No. 2 Power Boiler	1												
EQT 36	04-78 No. 1 Recovery Boiler	1	2											
EQT 37	05-78 No. 2 Recovery Boiler	1	2											
EQT 38	07-78 No. 2 Smelt Dissolving Tank	1												
EQT 39	20-93e No. 1 Paper Machine – No. 1 White Water Storage Tank													
EQT 40	20-93f No. 1 Paper Machine – No. 2 White Water Storage Tank													
EQT 41	20-93h No. 1 Paper Machine – No. 1 Broke Storage Tank													
EQT 42	20-93i No. 1 Paper Machine – No. 2 Broke Storage Tank													
EQT 43	20-93j Linerboard Whitewater Tank													
EQT 44	21-93e No. 2 Paper Machine – White Water Storage Tank													
EQT 45	21-93g No. 2 Paper Machine – Broke Storage Tank													
EQT 46	21-93h Corrugated Medium Whitewater Tank													

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR 64			40 CFR 68		
		A	D	Db	Kb	BB	GG	A	M	A	S	MM	DDDDD	MM	DDDDDD	MM
EQT 47	22-01p	No. 3 Paper Machine – T/S Reclaims/Reject Tank														
EQT 48	22-93b	No. 3 Paper Machine – High Density Thickener Tank														
EQT 49	22-93f	No. 3 Paper Machine – T/S Excess White Water Tank														
EQT 50	22-93h	No. 3 Paper Machine – Filtered White Water Tank														
EQT 51	22-93i	No. 3 Paper Machine – B/S White Water Storage Tank														
EQT 52	22-93j	No. 3 Paper Machine – T/S White Water Storage Tank														
EQT 53	22-93l	No. 3 Paper Machine – Broke Storage Tank														
EQT 54	28-93a	PLT – Primary Weak Black Liquor Storage Tank East														
EQT 55	28-93b	PLT – Primary Weak Black Liquor Storage Tank West														
EQT 56	28-93c	PLT – Secondary Weak Black Liquor Storage Tank														
EQT 57	28-93d	PLT – Semichemical Weak Black Liquor Storage Tank														
EQT 58	28-93e	PLT – Swing Weak Black Liquor Storage Tank														

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR		
		A	D	Db	BB	GG	A	M	A	S	MM	DDDDD	64
EQT 59	28-93f	PLT - No. 1 Intermediate Black Liquor Storage Tank											
EQT 60	28-93g	PLT - No. 2 Intermediate Black Liquor Storage Tank											
EQT 61	28-93h	PLT - Heavy Black Liquor Storage Tank											
EQT 62	28-93k	PLT - Soap Skimmer Tank (No. 2)											
EQT 63	28-93l	PLT - Soap Collection Tank (No. 1)											
EQT 64	28-93m	PLT - Soap Collection Tank (No. 2)											
EQT 65	28-93n	PLT - Soap Storage Tank											
EQT 66	28-93o	Boilout Tank											
EQT 67	28-93p	No. 1 Spill Tank											
EQT 68	28-93q	No. 2 Spill Tank											
EQT 69	28-93r	#1 RB Black Liquor Dump Tank											
EQT 70	28-93s	#2 RB Black Liquor Dump Tank											
EQT 71	29-93a	Causticizing Area - No. 1 Green Liquor Clarifier											
EQT 72	29-93b	Causticizing Area - No. 2 Green Liquor Clarifier											
EQT 73	29-93c	Causticizing Area - No. 1 Green Liquor Storage Tank											
EQT 74	29-93d	Causticizing Area - No. 2 Green Liquor Storage Tank											
EQT 75	29-93j	Causticizing Area - No. 1 Weak Wash Tank											

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR		
		A	D	Db	Kb	GG	A	M	A	S	MM	DDDDD	64
EQT 76	29-93k Causticizing Area – No. 2 Weak Wash Tank												
EQT 77	29-93l Causticizing Area – No. 1 White Liquor Clarifier												
EQT 78	29-93m Causticizing Area – No. 2 White Liquor Clarifier												
EQT 79	29-93n Causticizing Area – No. 1 White Liquor Storage Tank												
EQT 80	29-93o Causticizing Area – No. 2 White Liquor Storage Tank												
EQT 81	29-93p Causticizing Area – No. 3 White Liquor Storage Tank												
EQT 82	29-93q Causticizing Area – Lime Mud Mix Tank												
EQT 83	29-93t Causticizing Area – Lime Mud Storage Tank												
EQT 84	29-93v Waste Clarifier												
EQT 85	29-93w Sodium Hydrosulfide Tank #1												
EQT 86	29-93x Sodium Hydrosulfide Tank #2												
EQT 87	31-93i Pulp Mill Tanks – Primary High Density Chest A												
EQT 88	31-93j Pulp Mill Tanks – Primary High Density Chest B												
EQT 89	31-93k Pulp Mill Tanks – Primary High Density Chest C												

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR 64			40 CFR 68		
		A	D	Db	Kb	GG	A	M	A	S	MM	DDDDD	64	68		
EQT 90	31-931	Pulp Mill Tanks – Secondary High Density Chest														
EQT 91	31-93m	Pulp Mill Tanks – Semichemical High Density Chest														
EQT 92	31-93n	Pine Digester Dump Tank														
EQT 93	31-93o	Hardwood Digester Dump Tank														
EQT 94	31-93p	Semichemical Digester Dump Tank														
EQT 96	40-96	Unleaded Gasoline Bulk Tank														
EQT 98	43-96	No. 6 Fuel Oil Storage Tank														
EQT 99	44-96	Fuel Oil Day Tank (No. 6)														
EQT 100	56-98b	Crude Tall Oil – Soap Receiving Tank														
EQT 101	56-98c	Crude Tall Oil – Soap Decanting Tank														
EQT 102	56-98d	Crude Tall Oil – Soap Blend Tank														
EQT 103	56-98e	Crude Tall Oil – Sulfuric Acid Storage Tank														
EQT 104	56-98g	Crude Tall Oil – Neutralized Brine Storage Tank														
EQT 105	56-98h	Crude Tall Oil – Brine Feed Tank														
EQT 106	56-98j	Crude Tall Oil – Heel Liquor Sample Tank														
EQT 107	59-00a	Sulfuric Acid Supply Tank														
EQT 108	59-00b	Demin Water Acid Mix Tank														
EQT 109	59-00c	#3 PM Acid Supply Tank														
EQT 110	59-00d	#3 PM Bulk Sulfuric Acid Tank														
EQT 111	14-93	Repulper #1														
EQT 112	15-93	Repulper #2														

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR			
		A	D	Db	Kb	BB	GG	A	M	A	S	MM	DDDDD	64
EQT 113	16-93 Repulper #3													
EQT 114	20-01n No. 1 PM - Semichemical Fiber Sidehill Washing													
EQT 115	20-01o No. 1 PM - HW Refiner Low Density Chest													
EQT 116	20-01p No. 1 PM - Short Fiber Blend Chest													
EQT 117	20-93a No. 1 PM - Grouped Source													
EQT 118	20-93b No. 1 PM - Save-all Vent No. 1													
EQT 119	20-93c No. 1 PM - Save-all Mixing Chest													
EQT 120	20-93d No. 1 PM - Save-all White Water Filtrate Chest													
EQT 121	20-93g No. 1 PM - Broke Repulper													
EQT 122	20-93k #1 PM Secondary Pine Low Density Chest													
EQT 123	20-93l #1 PM Primary Pine Low Density Chest													
EQT 124	20-93m #1 PM Hardwood Low Density Chest													
EQT 125	21-04k No. 2 PM - No. 2 PM Stock Chest													
EQT 126	21-93a No. 2 PM - Grouped Source													
EQT 127	21-93b No. 2 PM - Save-all Vent No. 1													
EQT 128	21-93c No. 2 PM - Save-all Mixed Stock Chest													
EQT 129	21-93d No. 2 PM - Save-all White Water Filtrate Chest													
EQT 130	21-93f No. 2 PM - Broke Repulper													
EQT 131	21-93i #2 PM Pine Low Density Chest													

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR			
		A	D	Db	Kb	BB	GG	A	M	A	S	MM	DDDDD	64
EQT 132	#2 PM Semichemical Low Density Chest													
EQT 133	No. 3 PM – HW Fiber Low Density Chest/Standpipes													
EQT 134	No. 3 PM – Pine Fiber Low Density Chest/Standpipes													
EQT 135	No. 3 PM – Grouped Source													
EQT 136	No. 3 PM – Save-all Vent													
EQT 137	No. 3 PM – Save-all Stock Chest													
EQT 138	No. 3 PM – AES Filters													
EQT 139	No. 3 PM – Broke Repulper													
EQT 140	#3 PM Virgin Fiber Low Density Chest													
EQT 141	Process Chillers													
EQT 142	Causticizing Area – Dregs Filter													
EQT 143	Causticizing Area – No. 1 Causticizer													
EQT 144	Causticizing Area – No. 2 Causticizer													
EQT 145	Causticizing Area – No. 3 Causticizer													
EQT 146	Causticizing Area – No. 4 Causticizer													
EQT 147	Causticizing Area – No. 1 Lime Mud Washer													
EQT 148	Causticizing Area – No. 2 Lime Mud Washer													
EQT 149	Causticizing Area – Lime Mud Precoat Filter													

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR		
		A	D	Db	Bb	GG	A	M	A	S	MM	DDDDD	64
EQT 150	30-92a	Black Liquor Filters – Secondary Black Liquor Filter											
EQT 151	30-93b	Black Liquor Filters – Primary Black Liquor Filter											
EQT 152	60-00	Fiber Reclaims System											
EQT 153	63-04	Repulper #4											
EQT 154	64-04	Repulper #5											
EQT 155	NCG-A	Primary Digester System					1						1
EQT 156	NCG-B	Secondary Digester System					1						1
EQT 157	NCG-C	Semicarbonyl Digester System					1						1
EQT 158	NCG-D	No. 1 Evaporator					1						1
EQT 159	NCG-E	No. 2 Evaporator					1						1
EQT 160	NCG-H	No. 1 Concentrator/Intermediate Solids Concentrator					1						1
EQT 161	NCG-I	No. 2 Concentrator System					1						1
EQT 162	NCG-J	Condensate Stripper System					1						1
EQT 163	NCG-K	Turpentine Decanter											1
EQT 164	12A-78	Diffusion Washer Vent A					3						1
EQT 165	12B-78	Diffusion Washer Vent B						3					1
EQT 166	12C-78	Diffusion Washer Vent C						3					1
EQT 167	12D-78	Diffusion Washer Vent D						3					1
EQT 168	12E-78	Diffusion Washer Vent E						3					1
EQT 169	NCG-L	Turpentine Storage						3					1
EQT 170	28-93i	Stripped Condensate Tank											1

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR 64			40 CFR	
		A	D	Db	Bb	GG	A	M	A	S	MM	DDDDD	64	68	
EQT 171	31-93a Primary Filtrate Tank Vent - Washer A (Vent A)														
EQT 172	31-93b Primary Filtrate Tank Vent - Washer A (Vent B)														
EQT 173	31-93c Primary Filtrate Tank Vent - Washer B (Vent A)														
EQT 174	31-93d Primary Filtrate Tank Vent - Washer B (Vent B)														
EQT 175	31-93e Secondary Filtrate Tank Vent - (Vent A)														
EQT 176	31-93f Secondary Filtrate Tank Vent - (Vent B)														
EQT 177	31-93g Semi-chemical Filtrate Tank Vent - (Vent A)														
EQT 178	31-93h Semi-chemical Filtrate Tank Vent - (Vent B)														
EQT 179	TO-A Crude Tall Oil-Brine Receiver Tank														
EQT 180	TO-B Crude Tall Oil-Cleaner Accept's Tank														
EQT 181	TO-C Crude Tall Oil-Wet CTO Tank														
EQT 182	TO-D Crude Tall Oil-Dry CTO Tank														
EQT 183	No. 3 Paper Machine - B/S Excess White Water Tank														
EQT 184	32-93 Cationic Starch Silo														
EQT 185	NCG-M High Solids Concentrator														
EQT 186	65-05 Clarke Fire-Water Pump														

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X. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	40 CFR 60			40 CFR 61			40 CFR 63			40 CFR		
		A	D	Db	Kb	GG	A	M	A	S	MM	DDDDD	64
EQT 187	66-05 Lime Kiln Auxiliary Engine												
EQT 188	Miscellaneous Diesel-fired Rental Engines												
EQT 189	NCG-N 1A/1B Super Concentrator												
FUG 1	17-93 Coal Storage/Handling												
FUG 2	18-93 Ash Handling Operations												
FUG 3	19-93 Bark/Woodwaste/Sludge Handling												
FUG 4	23-93 Woodyard Grouped Source												
FUG 5	26-93 Haul Roads												
FUG 6	54-96 Paint Yard												
GRP3	- Pulping Condensates												

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KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
Facility-wide	Emission Standards for Particulate Matter [LAC 33:III.Chapter 13]	DOES NOT APPLY. Applies to any operation, process, or activity from which particulate matter is emitted except the wood pulping industry, the primary aluminum industry (horizontal stud Soderberg and prebake processes), and the burning of fuel for indirect heating in which the products of combustion do not come into direct contact with process materials. [LAC 33:III.1301.B]
	Chemical Accident Prevention Program [40 CFR 68; LAC 33:III.Chapter 59]	DOES NOT APPLY. Source does not produce, process, handle, or store any substance listed in 40 CFR 68.130 or Table 59.0 and 59.1 of LAC 33:III Chapter 59 in amounts greater than the threshold quantities.
EQT 5 EQT 35	Emission Monitoring Requirements [LAC 33:III.915]	EXEMPT. Sources are exempt from §915.A because they are subject to a new source performance standard promulgated in 40 CFR Part 60, that being NSPS Subpart D. [LAC 33:III.915.D]

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
	Continuous Emissions Monitoring [LAC 33:III.1511]	DOES NOT APPLY. The continuous emissions monitoring requirements of §1511.A do not apply because the boilers are exempt from the emission monitoring requirements of 40 CFR Part 51, Appendix P. [LAC 33:III.915.D]
	Comprehensive Toxic Air Pollutant Emission Control Program (STATE-ONLY) [LAC 33:III.5105]	EXEMPT. Emissions from the combustion of wood residue fuel are exempt from the provisions of LAC 33:III.5109. [LAC 33:III.5105.B.7]
EQT 7	Comprehensive Toxic Air Pollutant Emission Control Program (STATE-ONLY) [LAC 33:III.5105]	EXEMPT. Emissions from the combustion of Group 1 virgin fossil fuels are exempt from the requirements of Subchapter A of LAC 33:III.Chapter 51. [LAC 33:III.5105.B.3.a]
	Emission Standards for Sulfur Dioxide [LAC 33:III.Chapter 15]	DOES NOT APPLY. SO ₂ < 5 TPY. [LAC 33:III.1502.A.3]
EQT 6 EQT 15 EQT 38	Compliance Assurance Monitoring [40 CFR 64]	EXEMPT. CAM does not apply to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act. Sources are subject to particulate standards under §63.862 of 40 CFR 63 Subpart MM. [40 CFR 64.2(b)(1)(ii)]

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
	Chemical Woodpulping Industry [LAC 33:III.Chapter 23 Subpart A]	DOES NOT APPLY. The total reduced sulfur limitations of LAC 33:III.2301.D.3 do not apply to affected facilities subject to 40 CFR 60 Subpart BB. The Lime Kiln and Nos. 1 and 2 Smelt Dissolving Tanks are subject to NSPS Subpart BB. [LAC 33:III.2301.E]
EQT 36 EQT 37	Emission Monitoring Requirements [LAC 33:III.915]	<p>EXEMPT. Boilers are exempt from the SO₂, NO_x, and O₂/CO₂ emission monitoring requirements of 40 CFR Part 51, Appendix P. [LAC 33:III.915.C]</p> <ul style="list-style-type: none"> • SO₂ CEMS not required because no SO₂ pollution control equipment has been installed. (2.1.2) • NO_x CEMS not required because boilers have a heat input less than 1000 MM BTU/hr and DeSoto Parish is in attainment for NO_x. (2.1.3) • O₂ or CO₂ CMS not required because SO₂ and NO_x CEMS are not required. (2.1.4)
	Continuous Emissions Monitoring [LAC 33:III.1511]	DOES NOT APPLY. The continuous emissions monitoring requirements of §1511.A do not apply because an SO ₂ CEMS is not required per 40 CFR Part 51, Appendix P. [LAC 33:III.915.D]

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
	Chemical Woodpulping Industry [LAC 33:II.Chapter 23 Subpart A]	DOES NOT APPLY. The total reduced sulfur limitations of LAC 33:III.2301.D.3 do not apply to affected facilities subject to 40 CFR 60 Subpart BB. The Nos. 1 and 2 Recovery Boilers are subject to NSPS Subpart BB. [LAC 33:III.2301.E]
	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971. [40 CFR 60 Subpart D] Compliance Assurance Monitoring [40 CFR 64]	Maintain annual capacity factor for fossil fuel below 10%. [40 CFR 60 Subpart D] EXEMPT. CAM does not apply to emission limitations or standards proposed by the Administrator after November 15, 1990 pursuant to section 111 or 112 of the Act. Boilers are subject to particulate standards under §63.862 of 40 CFR 63 Subpart MM. [40 CFR 64.2(b)(1)(i)]

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ID No:	Requirement	Notes
EQT 155 EQT 156 EQT 157 EQT 158 EQT 159 EQT 160 EQT 161 EQT 162 EQT 185 EQT 189	Chemical Woodpulping Industry [LAC 33:III.Chapter 23 Subpart A]	DOES NOT APPLY. The total reduced sulfur limitations of LAC 33:III.2301.D.3 do not apply to affected facilities subject to 40 CFR 60 Subpart BB. The digester and evaporator systems are subject to NSPS Subpart BB. [LAC 33:III.2301.E]
EQT 28 EQT 29 EQT 30 EQT 31 EQT 32 EQT 33 EQT 34 EQT 186 EQT 187 EQT 188	Comprehensive Toxic Air Pollutant Emission Control Program (STATE-ONLY) [LAC 33:III.Chapter 51]	EXEMPT. Emissions from the combustion of Group 1 virgin fossil fuels are exempt from the requirements of Subchapter A of LAC 33:III.Chapter 51. [LAC 33:III.5105.B.3.a]

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
	Standards of Performance for Stationary CI/ICE [40 CFR 60 Subpart III]	DOES NOT APPLY. The IC engines brought onsite will never be owned or operated by the Mill.
	National Emissions Standards for Hazardous Air Pollutants for Stationary RIC/E [40 CFR 63 Subpart ZZZZ]	DOES NOT APPLY. The IC engines brought onsite will not trigger NEESHAP ZZZZ requirements as any engines brought onsite will never be owned or operated by the Mill.
EQT 16 EQT 169	Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Contents have a true vapor pressure less than 1.5 psia at storage conditions. [LAC 33:III.2103]

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
	VOL Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60 Subpart Kb]	DOES NOT APPLY. Capacity is less than 75 cubic meters (~19,815 gallons). 40 CFR 60.110b(a)
EQT 96	VOL Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60 Subpart Kb]	DOES NOT APPLY. Capacity is less than 75 cubic meters (~19,815 gallons). 40 CFR 60.110b(a)
EQT 96 EQT 98 EQT 99	Storage of Volatile Organic Compounds [LAC 33:III.2103] Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984. [40 CFR 60 Subpart Ka]	DOES NOT APPLY. Contents have a true vapor pressure less than 1.5 psia at storage conditions. [LAC 33:III.2103] DOES NOT APPLY. No. 6 fuel oil is not considered a petroleum liquid. 40 CFR 60.111a(b) Constructed in 1981.
EQT 100	Storage of Volatile Organic Compounds [LAC 33:III.2103]	DOES NOT APPLY. Contents have a true vapor pressure less than 1.5 psia at storage conditions.
	VOL Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984. [40 CFR 60 Subpart Kb]	DOES NOT APPLY. Capacity is less than 75 cubic meters (~19,815 gallons). §60.110b(a)
EQT 164 EQT 165 EQT 166 EQT 167 EQT 168	Standards of Performance for Kraft Pulp Mills [40 CFR 60 Subpart BB]	EXEMPT. Diffusion washers are excluded from the definition of brown stock washer system. §60.281(e)

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 10	Emission Standards for Sulfur Dioxide [LAC 33:III.1503]	EXEMPT. SO2 < 250 TPY. [LAC 33:III.1503.C]
EQT 15		
EQT 25		
EQT 28		
EQT 38		
EQT 6	Emission Standards for Sulfur Dioxide [LAC 33:II.Chapter 15]	DOES NOT APPLY. SO2 < 5 TPY. [LAC 33:III.1502.A.3]
EQT 29		
EQT 30		
EQT 31		
EQT 32		
EQT 33		
EQT 34		
EQT 186		
EQT 187		
EQT 188		

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT 8	Waste Gas Disposal [LAC 33:III.2115]	EXEMPT. These sources have a combined weight of VOCs equal to or less than 100 lbs in any continuous 24-hr period, or a vent gas VOC concentration less than 30,000 ppmv. [LAC 33:III.2115.H.c or d]
EQT 9		
EQT 14		
EQT 15		
EQT 17		
EQT 38 thru		
EQT 84		
EQT 87 thru		
EQT 94		
EQT 100		
EQT 101		
EQT 102		
EQT 104		
EQT 105		
EQT 106		
EQT 114 thru		
EQT 120		
EQT 122 thru		
EQT 129		
EQT 131 thru		
EQT 137		
EQT 140		
EQT 142 thru		
EQT 152		
EQT 164 thru		
EQT 168		
EQT 170 thru		
EQT 183		

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The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.